Commonwealth of Kentucky
Energy and Environment Cabinet
Department for Environmental Protection
Division for Air Quality
200 Fair Oaks Lane, 1st Floor
Frankfort, Kentucky 40601
(502) 564-3999

PROPOSED

AIR QUALITY PERMIT

Issued under 401 KAR 52:020

Permittee Name:	**IPSCO Tubulars Inc.**
Mailing Address:	**P.O. Box 721670, Newport, KY 41072**
Source Name:	**IPSCO Tubulars Inc.**
Mailing Address:	**100 Steel Plant Drive Wilder, KY 41071**
Source Location:	**100 Steel Plant Drive**
Permit:	**V-14-006**
Agency Interest:	**613**
Activity:	**APE20130006**
Review Type:	**Title V, Operating**
Source ID:	**21-037-00006**
Regional Office:	**Florence Regional Office 8020 Veterans Memorial Drive, Suite 110 Florence, KY 41042 (859) 525-4923**
County:	**Campbell**
Application Complete Date:	**May 7, 2014**
Issuance Date:	**September 17, 2014**
Expiration Date:	**September 17, 2019**

E-Signed by Sean Alteri
VERIFY authenticity with ApproveIt

Sean Alteri

Sean Alteri, Director
Division for Air Quality

Commonwealth of Kentucky
Division for Air Quality

EXECUTIVE SUMMARY

PROPOSED
Title V, Operating/Construction
Permit: V-14-006
IPSCO Tubulars Inc.
Wilder, KY 41071
September 8, 2014
Anthony Norman EIT, Reviewer

SOURCE ID:	21-037-00006
AGENCY INTEREST:	613
ACTIVITY:	APE20130006

SOURCE DESCRIPTION:

On December 9, 2013, the Division received IPSCO Tubulars Inc. renewal application for their Title V permit. The source is located at Wilder, Kentucky in Campbell County. The portion of Campbell County that the source is located in is a non-attainment area for Ozone. The source manufactures steel pipes and tubes. The manufacturing process begins by feeding steel coils into the material handling equipment of either the 8" or 16" Pipe Mill where they are cold-formed into a tubular configuration. The resultant tube is in-line welded by a high frequency electric resistance welder and cut into designated lengths. The pipe is inspected, tested, and coated with a varnish if required. Welded tubular products range in size from 4.5 to 16.0 inches in outside diameter.

Part of the renewal is the addition of a new coating facility. The new coating facility will surface treat, acid wash, and powder coat the pipes manufactured at the source`s current facility, described above, if their customers request it. The coating process consists of the following activities: Abrasive Blasting, Abrasive Removal, Phosphoric-based Acid Wash Solution, Powder Coating of Pipes, Pipe Stencil Printing, Cooling Tower, 7 Pre-Heat Electric Induction Coils, and 8 Powder Coating Electric Induction Coils. The Abrasive Removal recycles the steel shot and grit form the Abrasive blasting, allowing it to be reused. The Powder Coating of Pipes has a dust collector that is part of the process and allows the powder coating to be recycled and reuse. The new facility will emit Particulate Matter (PM), Volatile Organic Compounds (VOCs), and Hazardous Air Pollutants (HAPs) emissions.

IPSCO Tubulars Inc. has the potential to emit 289.787 tons of VOC per a year. Therefore, the source requires a Title V permit as per 401 KAR 52:020.

PUBLIC AND AFFECTED STATE REVIEW:

Affected states (Ohio and Indiana) were notified of the issuance of the draft permit on July 30th, 2014 via e-mail. On August 7th, 2014, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Florence Boone Recorders* in Wilder, Kentucky. The public comment period expired 30 days from the date of publication.

No comments were received during this period. The final determination of this Division is that the proposed operation will comply with all air quality regulations and requirements. The permit is now being issued as proposed. A final permit will be issued after the United States Environmental Protection Agency`s (U.S. EPA) 45-day review.

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	Permit type	Activity#	Complete Date	Issuance Date	Summary of Action
V-08-023	Renewal	APE20080001	11/03/2008	6/9/2009	Title V Operating Renewal
V-14-006	Renewal	APE20130006	5/07/2014		Title V Operating Renewal

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality (Division) hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes (KRS) Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Energy and Environment Cabinet (Cabinet) or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 01 (08) 8" Pipe Coating Line

Description: Continuous steel pipe coater using a clear coat lacquer to coat pipes between 4" and 8" in diameter. Coating is applied using one airless spray applicator with six nozzles positioned on the wheel of an enclosed structure that has water circulating through it to capture overspray and VOC vapor. Maximum spray capacity is eight gallons per hour. The maximum usage of clear coat and solvent per year is 50,000 gallons. Emissions from the coater enter the ambient air through a roof stack.
Control Device: None
Construction Commenced: 1976

APPLICABLE REGULATIONS:
401 KAR 50:012. General application. Applicable to major sources of VOC located in a county or portion of a county which is designated nonattainment for Ozone

401 KAR 59:010. New process operations. Applicable to each affected facility associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced on or after July 2, 1975.

401 KAR 61:132. Existing miscellaneous metal parts and products surface coating operations. Applicable to affected facilities commenced before February 4, 1981, located in a county or portion of a county which is designated nonattainment for ozone

1. **Operating Limitations:**
   In order to be exempt from Section 3 of 401 KAR 61:132, permittee shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

   Compliance Demonstration Method:
   Refer to Subsection **5. Specific Recordkeeping Requirements** and **3. Testing Requirements**

2. **Emission Limitations:**
   A. **Standard for Particulate Matter (401 KAR 59:010 Section 3(2)):**
   Emission of particulate matter from a stack of any affected facility up to a process rate of 1000 lbs/hr shall not exceed **2.34** lbs/hr. For processing rates greater than 1000 lbs/hr up to 60,000 lbs/hr, particulate emissions shall not exceed the emission rate calculated by the following equation:

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)
P = the process rate (tons/hour)

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Compliance Demonstration Method:
The source is considered to be in compliance when the emission points are operating and properly maintained according to the manufacturer's recommendations. Refer to Subsection **4. Monitoring Requirements.**

B. Standard for Opacity (401KAR 59:010 Section (3)):
The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.

Compliance Demonstration Method:
Refer to Subsection **4. Monitoring Requirements.**

3. Testing Requirements:

A. If the Division requires it, the owner or operator shall perform Reference Method 5 tests, or other methods approved by the Division, to determine the emission rate of particulate matter. [401 KAR 59:010, Section 4(1), Test Methods and Procedures]

B. If the Division requires it, the owner or operator shall perform Kentucky Method 150 (F-1) tests to determine the opacity of intermittent emissions or Method 9 tests to determine the opacity of continuous emissions. [401 KAR 59:010, Section 4 (5) and (6), Test Methods and Procedures]

C. If the Division requires it, the owner or operator shall use Reference Method 24, or other methods approved by the Division, to verify that the coatings used at an affected facility meet the exemption requirements in 401 KAR 61:132 Section 6. [401 KAR 61:132, Section 4(4), Compliance]

D. Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 Section 2(2) and 50:045 Section 4.

4. Specific Monitoring Requirements:

A. Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at each roofline no less than weekly and maintaining a log of the observations. If visible emissions from the roofline are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

B. The permittee shall monitor the amount and type of coating and solvent used at the point of application, including exempt compounds daily.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

C. The permittee shall monitor the VOC content as applied in each coating and solvent.

D. The permittee shall monitor the amount and type of clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each daily.

E. The permittee may use the MSDS or manufacturer's data for each type of coating, solvent, clean-up, or wash-up solvent used to satisfy the requirement to monitor VOC content.

5. **Specific Recordkeeping Requirements:**

A. The permittee shall maintain records of corrective actions taken as a result of seeing visible emissions from the roof stack, including date and time.

B. The permittee shall maintain records of Method 9 readings, if performed.

C. Pursuant to 401 KAR 61:132, Section 4(8), daily records shall be maintained by the permittee for the most recent two (2) year period. These records shall be made available to the cabinet or the U.S. EPA upon request. The records shall include, but not be limited to, the following:
(1) Applicable administrative regulation number;
(2) Application method and substrate type;
(3) Amount and type of coating (including catalyst and reducer for multicomponent coatings), or solvent used at each point of application, including exempt compounds;
(4) Amount and type of coating (including catalyst and reducer for multicomponent coatings), or solvent recovered, including exempt compounds;
(5) The VOC content as applied in each coating, or solvent;
(6) The date for each application for coating, or solvent;
(7) The amount of surface preparation, clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each; and
(8) Oven temperature, if applicable.

6. **Specific Reporting Requirements:**

A. When corrective actions are required due to an opacity exceedance as noted in **Emission Limitations** the permittee shall submit the following information from the control device inspection and repair log.
(1) A description of the deviation,
(2) The date and time period of the deviation, and
(3) Actions taken to correct the deviation.
(4) A statement of the cause of each deviation.
Copies of these records shall be submitted as a part of the semiannual reporting as required in **Section F, Subsection 5, and 6**

B. A summary of the monthly amounts and types of coating, solvent and clean-up or washsolvents used and recovered.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

C. The VOC content of each coating, solvent and clean-up or wash-solvent used during the reporting period. The permittee may use the MSDS or manufacturer's data for each type of coating, solvent, clean-up, or wash-up solvent used to satisfy the requirement to monitor VOC content.

7. **Specific Control Equipment Operating Conditions:**
None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

Emission Unit 02 (09) 16" Pipe Coating Line

Description: Continuous steel pipe coater using a clear coat lacquer to coat pipes between 4.5" and 16" in diameter. Coating is applied using one airless spray applicator with twelve nozzles positioned on the wheel of an enclosed structure that has water circulating through it to capture overspray and VOC vapor. Maximum spray capacity is eight gallons per hour. The coating line is limited to 76.1 tons of VOC emissions per rolling twelve month total. Emissions from the coater enter the ambient air through a roof stack.
Control Device: None
Construction Commenced: 1984

APPLICABLE REGULATIONS:
401 KAR 50:012. General application. Applicable to major sources of VOC located in a county or portion of a county which is designated nonattainment for Ozone

401 KAR 59:010. New process operations. Applicable to each affected facility associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced on or after July 2, 1975.

401 KAR 59:225. New miscellaneous metal parts and products surface coating operations. Applicable to affected facilities commenced on or after February 4, 1981, located in a county or portion of a county which is designated nonattainment for Ozone

1. **Operating Limitations:**
   In order to be exempt from Section 3 of 401 KAR 59:225, the permittee shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

   Compliance Demonstration Method:
   Refer to Subsection **5. Specific Recordkeeping Requirements** and **3. Testing Requirements**

2. **Emission Limitations:**
   A. **Standard for Particulate Matter (401 KAR 59:010 Section 3(2)):**
   Emission of particulate matter from a stack of any affected facility up to a process rate of 1000 lbs/hr shall not exceed **2.34** lbs/hr. For processing rates greater than 1000 lbs/hr up to 60,000 lbs/hr, particulate emissions shall not exceed the emission rate calculated by the following equation:

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)
P = the process rate (tons/hour)

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Compliance Demonstration Method:
The source is considered to be in compliance when the emission points are operating and properly maintained according to the manufacturer's recommendations. Refer to Subsection **4. Monitoring Requirements.**

B. Standard for Opacity (401KAR 59:010 Section (3)):
The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.

Compliance Demonstration Method:
Refer to Subsection **4. Monitoring Requirements.**

C. VOC emissions from this coating line shall not exceed 76.1 tons during any consecutive twelve (12) month period.

Compliance Demonstration Method 3:
Compliance with the VOC emission limit above may be determined by the following equation:

$$E_{VOC} = \sum_{i=1}^{12} \sum_{j=1}^{n} \left(\frac{P_{ij} * VOC_j}{2000} \right) + \sum_{i=1}^{12} \sum_{k=1}^{m} \left(\frac{S_{ik} * VOC_k}{2000} \right)$$

Where E_{VOC} = 12-month rolling total VOC emissions (tons/year), i = month, j = coating, n = total number of coatings applied at this point, P_{ij} = coating j usage rate for month i (gal/month), VOC_j = VOC content of coating j (lb/gal), k = solvent, m = total number of solvents used at this point, S_{ik} = solvent k usage rate for month i (gal/month), and VOC_k = VOC content of solvent k (lb/gal).

3. Testing Requirements:

A. If the Division requires it, the owner or operator shall perform Reference Method 5 tests, or other methods approved by the Division, to determine the emission rate of particulate matter. [401 KAR 59:010, Section 4(1), Test Methods and Procedures]

B. If the Division requires it, the owner or operator shall perform Kentucky Method 150 (F-1) tests to determine the opacity of intermittent emissions or Method 9 tests to determine the opacity of continuous emissions. [401 KAR 59:010, Section 4 (5) and (6), Test Methods and Procedures]

C. If the Division requires it, the owner or operator shall use Reference Method 24, or other methods approved by the Division, to verify that the coatings used at an affected facility meet the exemption requirements in 401 KAR 59:225 Section 6. [401 KAR 59:225, Section 4(4), Compliance]

D. Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 Section 2(2) and 50:045 Section 4.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. **Specific Monitoring Requirements:**

   A. Compliance with the opacity standard shall be determined by the permittee performing a qualitative visual observation of the opacity of emissions at each stack no less than weekly and maintaining a log of the observations. If visible emissions from the roofline are seen (not including condensed water in the plume), then an inspection of control equipment shall be initiated and corrective action taken. If visible emissions are present after the corrective action, the process shall be shut down and shall not operate again until repairs have been made that result in no visible emissions from the process during operation. In lieu of shutting the process down, the permittee may determine the opacity using Reference Method 9. If the opacity limit is not exceeded, the process may continue to operate.

   B. The permittee shall monitor the amount and type of coating and solvent used at the point of application, including exempt compounds daily.

   C. The permittee shall monitor the VOC content as applied in each coating and solvent.

   D. The permittee shall monitor the amount and type of clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each daily.

   E. The permittee may use the MSDS or manufacturer's data for each type of coating, solvent, clean-up, or wash-up solvent used to satisfy the requirement to monitor VOC content.

   F. The permittee shall calculate the monthly and 12-month rolling total VOC emissions for this coating line.

5. **Specific Recordkeeping Requirements:**

   A. The permittee shall maintain records of corrective actions taken as a result of seeing visible emissions from the roof stack, including date and time.

   B. The permittee shall maintain records of Method 9 readings it performed.

   C. Pursuant to 401 KAR 59:225, Section 4(8), daily records shall be maintained by the permittee for the most recent two (2) year period. These records shall be made available to the cabinet or the U.S. EPA upon request. The records shall include, but not be limited to, the following:
   (1) Applicable administrative regulation number;
   (2) Application method and substrate type;
   (3) Amount and type of coating (including catalyst and reducer for multicomponent coatings), or solvent used at each point of application, including exempt compounds;
   (4) Amount and type of coating (including catalyst and reducer for multicomponent coatings), or solvent recovered, including exempt compounds;
   (5) The VOC content as applied in each coating, or solvent;
   (6) The date for each application for coating, or solvent;

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

(7) The amount of surface preparation, clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each; and
(8) Oven temperature, if applicable.

D. The permittee shall record VOC emissions monthly, subsequently tons of VOC emissions per rolling 12-month period shall be recorded.

6. **Specific Reporting Requirements:**

A. When corrective actions are required due to an opacity exceedance as noted in **Emission Limitations** the permittee shall submit the following information from the control device inspection and repair log.
(1) A description of the deviation.
(2) The date and time period of the deviation, and
(3) Actions taken to correct the deviation.
(4) A statement of the cause of each deviation.
Copies of these records shall be submitted as a part of the semiannual reporting as required in **Section F, Subsection 5, and 6**

B. A summary of the monthly amounts and types of coating, solvent and clean-up or washsolvents used and recovered.

C. The VOC content of each coating, solvent and clean-up or wash-solvent used during the reporting period. The permittee may use the MSDS or manufacturer's data for each type of coating, solvent, clean-up, or wash-up solvent used to satisfy the requirement to monitor VOC content.

D. The monthly and 12-month rolling total VOC emissions for the coating line.

7. **Specific Control Equipment Operating Conditions:**
None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 03 (11) **Haul Roads**

Description: This emission point includes various paved and unpaved roads within the plant boundaries used to transport equipment, material, personnel, etc.
Control Device: None
Construction Commenced: 1984

APPLICABLE REGULATIONS:
401 KAR 63:010. Fugitive Emissions

1. **Operating Limitations:**
   See (**7. Specific Control Equipment Operating Conditions**).

2. **Emission Limitations:**
   Visible fugitive dust emissions shall not be discharged beyond the lot line of the property.

3. **Testing Requirements:**
   Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 Section 2(2) and 50:045 Section 4.

4. **Specific Monitoring Requirements:**
   Visual observations shall be made daily during operation of the affected facility to determine compliance with **2. Emission Limitations** above.

5. **Specific Recordkeeping Requirements:**
   The permittee shall keep records of the dates that it swept, and applied water/dust suppressants to roadways, and these records shall be made available to Division personnel upon request. Records shall be kept of the observations indicating if fugitive emissions are discharged beyond property line.

6. **Specific Reporting Requirements:**
   Any exceedance of the visible fugitive dust emissions standard specified in this permit shall be reported to the Division within 30 days.

7. **Specific Control Equipment Operating Conditions:**
   The permittee shall employ a combination of the following to control fugitive dust emissions: sweeping for paved roads, watering and the use of dust suppressants, and restricting vehicles' speed on unpaved roads. Records shall be kept of all such activities.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 04 (14) **Parts Washers (12)**

Description: Cleaning of metal parts to remove soils. Coated pipes are cleaned with mineral spirits.
Control Device: None
Construction Commenced: 2005

APPLICABLE REGULATIONS:
401 KAR 50:012. General application. Applicable to major sources of VOC located in a county or portion of a county which is designated nonattainment for ozone.

401 KAR 59:185, New solvent metal cleaning equipment. Applicable to affected facilities commenced on or after June 29, 1979 located in a county designated in 401 KAR 51:010 as nonattainment for ozone for any classification except marginal.

401 KAR 63:020, Potentially Hazardous Matter and Toxic Substance Emissions, applies to the potentially hazardous matter and toxic substance emissions from affected facilities.

1. **Operating Limitations:**
   A permanent, conspicuous label, summarizing the operating requirements specified in 401 KAR 59:185 Section 4(2) as given below shall be installed on or near the cleaner. 401 KAR 59:185 Section 4(1)(c).

   Operating requirements:
   A. The cleaner shall be equipped with a cover.

   B. The cleaner shall be equipped with a drainage facility so that solvent that drains off parts removed from the cleaner will return to the cleaner

   C. Cold cleaners shall have a remote solvent reservoir.

   D. Cold cleaners shall not use a solvent with a vapor pressure that exceeds one (1.0) mm Hg (0.019 psi) measured at 20° C (68°F).

   E. The sink-like work area shall have an open drain area less than 100 sq. cm.

   F. Waste solvent shall be stored and/or properly disposed of with minimal loss due to evaporation.

   G. Waste solvent shall not be disposed of or transferred to another party so that greater than twenty (20) percent by weight of the waste solvent can evaporate into the atmosphere. Waste solvent shall be stored only in covered containers.

   H. The degreaser cover shall be closed if not handling parts in the cleaner.

   I. Cleaned parts shall be drained for a minimum of fifteen (15) seconds, or until dripping ceases, whichever is longer.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

J. Work area fans shall be positioned so that air is not directed across the opening of the cold cleaner.

K. The cold cleaner and auxiliary cleaning equipment shall be free of all liquid leaks.

L. Spills that occur during solvent transfer shall be cleaned immediately. Wipe rags, or other absorbent equipment and materials, used to clean the spill shall be stored in a covered container for disposal unless storage of these items is prohibited by fire protection authorities.

2. **Emission Limitations:**

401 KAR 63:020, Section 3;

The permittee shall not allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants.

Compliance Demonstration Method:

The source is in compliance with 401 KAR 63:020 based on the rates of emissions of airborne toxics provided in the application submitted by the source. If the source alters processes, process rates, material formulations, or any other factor that would result in increased emissions of these previously evaluated airborne toxics, or the emission of airborne toxics not previously evaluated by the Division, the source shall submit the appropriate application forms pursuant to 401 KAR 52:030, Section 3(1)(a).

3. **Testing Requirements:**

Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 Section 2(2) and 50:045 Section 4.

4. **Specific Monitoring Requirements:**

The total gallons of solvent added to the cleaner shall be monitored monthly.

5. **Specific Recordkeeping Requirements:**

A. The following records shall be maintained for a minimum of five (5) years that include the following information for each solvent purchase:

(1) The name and address of the solvent supplier;
(2) The date of the purchase;
(3) The type of solvent; and
(4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

B. Records of the gallons of solvent used monthly shall be maintained

6. **Specific Reporting Requirements:**

Records of the monthly gallons of solvent used in the parts washers.

7. **Specific Control Equipment Operating Conditions:**

The parts washer covers shall be closed if not handling parts in the cleaner.

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 05(15) Cooling Towers (2)

APPLICABLE REGULATIONS:
None

1. **Operating Limitations:**
   No chromium-based water treatment chemicals shall be used in the industrial process cooling towers.

2. **Emission Limitations:**
   None

3. **Testing Requirements:**
   Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 Section 2(2) and 50:045 Section 4.

4. **Specific Monitoring Requirements:**
   None

5. **Specific Recordkeeping Requirements:**
   Records shall be maintained of the chemicals (MSDS) for any water treatment chemical used in the cooling towers.

6. **Specific Reporting Requirements:**
   Any water treatment chemical that is used in the cooling tower and is later found to contain chromium shall be reported to the Division within 3 days of the date of discovery.

7. **Specific Control Equipment Operating Conditions:**
   None

SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Emission Unit 06 (16) **Gasoline Tank and Dispenser**
1,500 gallons of Gasoline stored. Maximum though put 50,000 gallons a year

APPLICABLE REGULATIONS:

40 CFR 63, Subpart CCCCCC, National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (GDF).

401 KAR 50:012. General application. Applicable to major sources of VOC located in a county or portion of a county which is designated nonattainment for Ozone

1. **Operating Limitations:**
   If the source's GDF has a monthly throughput of less than 10,000 gallons of gasoline, then the permittee shall comply with the following Compliance Demonstration Method [40 CFR 63.11111(b)]:

   Compliance Demonstration Method:
   The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [40 CFR 63.11116]:
   1) Minimize gasoline spills;
   2) Clean up spills as expeditiously as practicable;
   3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
   4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

2. **Emission Limitations:**
   None

3. **Testing Requirements:**
   Testing shall be conducted at such times as may be required by the Cabinet in accordance with 401 KAR 59:005 Section 2(2) and 50:045 Section 4.

4. **Monitoring Requirements:**
   None

5. **Specific Record Keeping Requirements:**
   The permittee is not required to submit notifications or reports as specified in 40 CFR 63.11125 and 63.11126, but the permittee shall have records available within 24 hours of a request by the Division to document the source's gasoline throughput. [40 CFR 63.11116(b)]

6. **Specific Reporting Requirements:**
   None

7. **Specific Control Equipment Operating Conditions:**
   See Operating Limitations above

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. Although these activities are designated as insignificant the permittee must comply with the applicable regulation. Process and emission control equipment at each insignificant activity subject to an opacity standard shall be inspected monthly and a qualitative visible emissions evaluation made. Results of the inspection, evaluation, and any corrective action shall be recorded in a log.

Description	Generally Applicable Regulation
1. Hydraulic oil tank	None
2. Lubricating oil tanks	None
3. Paint sticks for marking coils/paint cans	None
4. Torch cutting of steel	401 KAR 59:010
5. Kerosene degreasing	None
6. Waste lube oil tank	None
7. 40 KW Data Center Emergency generator (Diesel)	None
8. 20 KW Computer Equipment Emergency generator (Natural Gas)	None
9. 5 KW Maintenance Portable Emergency Generator (Gasoline)	None
10. Spaceheaters (Natural Gas/Propane)	None
11. Kerosene storage tanks	None
12. Water heaters	None
13. Fabrication shop	401 KAR 59:010
14. Mobile welding/cutting	401 KAR 59:010
15. Spaceheaters (electric)	None
16. Electric resistance welding (pipe mills)	401 KAR 59:010
17. Maintenance/welding/grinding/sanding/painting	401 KAR 59:010

SECTION C - INSIGNIFICANT ACTIVITIES (CONTINUED)

18. Oil storage tanks	None
19. Pipe reamers	None
20. Pipe handling	401 KAR 63:010
21. Maintenance Shop	401 KAR 63:010
22. Diesel Tank	None
23. Abrasive Blasting	401 KAR 59:010
24. Abrasive Removal	401 KAR 59:010
25. Phosphoric-based Acid Wash Solution	None
26. Powder Coating of Pipes	401 KAR 59:010
27. Pipe Stencil Printing	401 KAR 63:020
28. Cooling Tower	401 KAR 59:010
29. 7 Pre-Heat Electric Induction Coils	None
30. 8 Powder Coating Electric Induction Coils	None

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. VOC, and PM/PM10 emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b-IV-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five (5) years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b-IV-2 and 1a-8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020, Section 3(1)h, the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit;
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Sections 1b-V-1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020, Section 23. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1, the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
   a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.

8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7 above) to the Regional Office listed on the front of this permit within 30 days. Deviations from permit requirements, including those previously reported under F.7 above, shall be included in the semiannual report required by F.6 [Sections 1b-V, 3 and 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. Pursuant to 401 KAR 52:020, Title V permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
   a. Identification of the term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;
   d. The method used for determining the compliance status for the source, currently and over the reporting period.
   e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

f. The certification shall be submitted by January 30th of each year. Annual compliance certifications shall be sent to the following addresses:

Division for Air Quality
Florence Regional Office
802 Veterans Memorial Drive
Suite 110
Florence, KY 41042

U.S. EPA Region 4
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within 30 days of the date the Kentucky Emissions Inventory System (KYEIS) emissions survey is mailed to the permittee.

SECTION G - GENERAL PROVISIONS

1. General Compliance Requirements

   a. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020, Section 3(1)(b), and a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a-3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   b. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a-6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   c. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
      (1) If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
      (2) The Cabinet or the United States Environmental Protection Agency (U. S. EPA) determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
      (3) The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;
      (4) New requirements become applicable to a source subject to the Acid Rain Program.

      Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

   d. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Sections 1a- 7 and 8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

   e. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:020, Section 3(1)(c)].

SECTION G - GENERAL PROVISIONS (CONTINUED)

f. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

g. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a-14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

h. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a-4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

i. All emission limitations and standards contained in this permit shall be enforceable as a practical matter. All emission limitations and standards contained in this permit are enforceable by the U.S. EPA and citizens except for those specifically identified in this permit as state-origin requirements. [Section 1a-15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

j. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a-10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

k. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3) 2].

l. This permit does not convey property rights or exclusive privileges [Section 1a-9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

m. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Cabinet or any other federal, state, or local agency.

n. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3) 4.].

o. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3) 1.].

SECTION G - GENERAL PROVISIONS (CONTINUED)

p. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

q. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
   (1) Applicable requirements that are included and specifically identified in this permit; and
   (2) Non-applicable requirements expressly identified in this permit.

2. Permit Expiration and Reapplication Requirements

a. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six (6) months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

b. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020, Section 8(2)].

3. Permit Revisions

a. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan (SIP) or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

b. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

4. Construction, Start-Up, and Initial Compliance Demonstration Requirements

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction of the equipment described herein, Insignificant Activities 23

SECTION G - GENERAL PROVISIONS (CONTINUED)

though 30 from Section C of this permit in accordance with the terms and conditions of this permit.

a. Construction of any process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.

b. Within thirty (30) days following commencement of construction and within fifteen (15) days following start-up and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Regional Office listed on the front of this permit in writing, with a copy to the Field Office Branch of the Frankfort Central Office, notification of the following:
   (1) The date when construction commenced.
   (2) The date of start-up of the affected facilities listed in this permit.
   (3) The date when the maximum production rate specified in the permit application was achieved.

c. Pursuant to 401 KAR 52:020, Section 3(2), unless construction is commenced within eighteen (18) months after the permit is issued, or begins but is discontinued for a period of eighteen (18) months or is not completed within a reasonable timeframe then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Upon written request, the Cabinet may extend these time periods if the source shows good cause.

d. For those affected facilities for which construction is authorized by this permit, a source shall be allowed to construct with the proposed permit. Operational or final permit approval is not granted by this permit until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055. If compliance is not demonstrated within the prescribed timeframe provided in 401 KAR 50:055, the source shall operate thereafter only for the purpose of demonstrating compliance, unless otherwise authorized by Section I of this permit or order of the Cabinet.

e. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with 401 KAR 50:055, General compliance requirements. Testing must also be conducted in accordance with General Provisions G.5 of this permit.

f. Terms and conditions in this permit established pursuant to the construction authority of 401 KAR 51:017 or 401 KAR 51:052 shall not expire.

SECTION G - GENERAL PROVISIONS (CONTINUED)

5. Testing Requirements

   a. Pursuant to 401 KAR 50:045, Section 2, a source required to conduct a performance test shall submit a completed Compliance Test Protocol form, DEP form 6028, or a test protocol a source has developed for submission to other regulatory agencies, in a format approved by the cabinet, to the Division's Frankfort Central Office a minimum of sixty (60) days prior to the scheduled test date. Pursuant to 401 KAR 50:045, Section 7, the Division shall be notified of the actual test date at least thirty (30) days prior to the test.

   b. Pursuant to 401 KAR 50:045, Section 5, in order to demonstrate that a source is capable of complying with a standard at all times, any required performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. If [When] the maximum production rate represents a source's highest emissions rate and a performance test is conducted at less than the maximum production rate, a source shall be limited to a production rate of no greater than 110 percent of the average production rate during the performance tests. If and when the facility is capable of operation at the rate specified in the application, the source may retest to demonstrate compliance at the new production rate. The Division for Air Quality may waive these requirements on a case-by-case basis if the source demonstrates to the Division's satisfaction that the source is in compliance with all applicable requirements.

   c. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

6. Acid Rain Program Requirements

   a. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

   b. The permittee shall comply with all applicable requirements and conditions of the Acid Rain Permit and the Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) incorporated into the Title V permit issued for this source. The source shall also comply with all requirements of any revised or future acid rain permit(s) issued to this source.

7. Emergency Provisions

   a. Pursuant to 401 KAR 52:020, Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
   (1) An emergency occurred and the permittee can identify the cause of the emergency;

SECTION G - GENERAL PROVISIONS (CONTINUED)

(2) The permitted facility was at the time being properly operated;
(3) During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
(4) Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.1-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
(5) This requirement does not relieve the source of other local, state or federal notification requirements.

b. Emergency conditions listed in General Condition G.7.a above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

c. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

8. Ozone Depleting Substances

a. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
(1) Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
(2) Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
(3) Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166
(5) Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

b. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

SECTION G - GENERAL PROVISIONS (CONTINUED)

9. Risk Management Provisions

   a. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

      RMP Reporting Center
      P.O. Box 10162
      Fairfax, VA 22038

   b. If requested, submit additional relevant information to the Division or the U.S. EPA.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

None

Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS

Title V, Operating
Permit: V-14-006
IPSCO Tubulars Inc.
Wilder, KY 41071
July 8, 2014
Anthony Norman EIT, Reviewer

SOURCE ID:	21-037-00006
AGENCY INTEREST:	613
ACTIVITY:	APE20130006

SOURCE DESCRIPTION:

On December 9, 2013, the Division received IPSCO Tubulars Inc. renewal application for their Title V permit. The source is located at Wilder, Kentucky in Campbell County. The portion of Campbell County that the source is located in is a non-attainment area for Ozone. The source manufactures steel pipes and tubes. The manufacturing process begins by feeding steel coils into the material handling equipment of either the 8" or 16" Pipe Mill where they are cold-formed into a tubular configuration. The resultant tube is in-line welded by a high frequency electric resistance welder and cut into designated lengths. The pipe is inspected, tested, and coated with a varnish if required. Welded tubular products range in size from 4.5 to 16.0 inches in outside diameter.

Part of the renewal is the addition of a new coating facility. The new coating facility will surface treat, acid wash, and powder coat the pipes manufactured at the source's current facility, described above, if their customers request it. The coating process consists of the following activities: Abrasive Blasting, Abrasive Removal, Phosphoric-based Acid Wash Solution, Powder Coating of Pipes, Pipe Stencil Printing, Cooling Tower, 7 Pre-Heat Electric Induction Coils, and 8 Powder Coating Electric Induction Coils. The Abrasive Removal recycles the steel shot and grit form the Abrasive blasting, allowing it to be reused. The Powder Coating of Pipes has a dust collector that is part of the process and allows the powder coating to be recycled and reuse. The new facility will emit Particulate Matter (PM), Volatile Organic Compounds (VOCs), and Hazardous Air Pollutants (HAPs) emissions.

IPSCO Tubulars Inc. has the potential to emit 289.787 tons of VOC per a year. Therefore, the source requires a Title V permit as per 401 KAR 52:020.

APPLICABLE REGULATIONS:

401 KAR 50:012. General application. Applicable to major sources of VOC located in a county or portion of a county which is designated as nonattainment for ozone.

401 KAR 59:010. New process operations. Applicable to each affected facility associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced on or after July 2, 1975.

401 KAR 61:132. Existing miscellaneous metal parts and products surface coating operations. Applicable to affected facilities commenced before February 4, 1981, located in a county or portion of a county which is designated as nonattainment for ozone.

401 KAR 59:225. New miscellaneous metal parts and products surface coating operations. Applicable to affected facilities commenced on or after February 4, 1981, located in a county or portion of a county which is designated as nonattainment for ozone.

401 KAR 63:010. Fugitive Emissions

401 KAR 59:185, New solvent metal cleaning equipment. Applicable to affected facilities commenced on or after June 29, 1979 located in a county designated as nonattainment for ozone.

401 KAR 63:020, Potentially Hazardous Matter and Toxic Substance Emissions, applies to the potentially hazardous matter and toxic substance emissions from affected facilities.

40 CFR 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Source Category: Gasoline Dispensing Facilities, applies to Gasoline Dispensing Facilities located at an area source.

NON APPLICABLE REGULATIONS:

40 CFR 63, Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories: The provisions of this subpart are not applicable to this emission point because the source does not fall under one of the nine source categories affected by the Subpart.

40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The provisions of this subpart are not applicable to the source's emergency generator's since the total and single horse power rates are negligible.

PRECLUDED REGULATIONS:

None

COMMENTS:

HISTORY:

IPSCO Tubulars Inc. was formerly Newport Steel Corporation. The site where ISPCO Tubulars Inc. is located at today use to be a race track until it was bought by Newport Steel Corporation in 1906 when it became a steel mill, where steel pipes, sheets, and plates were manufactured. In 1998, Newport Steel Corporation removed its existing three furnaces and added three new furnaces. In order for this construction not to trigger 401 KAR 59:017, the source took self-imposed limits on criteria pollutants. The source removed the above-mentioned three furnaces, continuous caster and all melting supporting equipment from its facility in 2004. This left the pipe forming, cutting and coating processes and a landfill for the dust and slag from the melting processes at the facility.

The removal of the melting operations allowed the source to changes its SIC code from #3312 (Steel Works, Blast Furnaces) to #3317 (Steel Pipe and Tubes). It was suggested by the Division that the SIC code be #3479 (Coating, Engraving, and Allied Services not Elsewhere Classified), yet the source wanted SIC code #3317, since the source's primary function is to manufacture the pipes. The pipe forming, cutting and coating equipment consists of the following: 8" Pipe Coating, 16" Pipe Coating, Parts Washers, Cooling Towers, and process supporting equipment. The 8" Pipe Coating

was an existing emission unit that was incorporated into the Title V permit with a VOC limit of

107.5 tons per 12 consecutive months, later on this emission limit was removed when the melting equipment was removed. The 16" Pipe Coating was built in 1984, when the source's location was classified as a non-attainment zone for ozone. Therefore, the source took a VOC limit of 38.7 tons per 12 consecutive months to preclude New Source Review. The 38.7 tons limit was increased to 76.1 tons in response to VOC netting analysis, which included the removal of the melting equipment. Initially 40 CFR 63 Subpart Q was applicable to cooling tower, later the regulation was deemed inapplicable since the source did and would not use chromium based water treatment chemicals in its cooling tower.

On November 29, 2006, Newport Steel Corporation was bought by ISPCO Tubulars, Inc., since then the source has added and removed some of the insignificant activities and has closed its landfill. On May 28, 2014 and July 8, 2014, ISPCO Tubulars Inc. submitted applications for a new coating facility. This new coating facility was incorporated into the renewal permit, V-14-006.

PIPE COATING LINE

Emission Point	Description	Capacity	Construction	Control Device	Applicable Regulation
EP 8	8" Coating Operation	8 gal/hr	1976	None	401 KAR 50:012 401 KAR 59:010 401 KAR 61:132
	Stoddard Solvent	0.2511 gal/hr			

Continuous steel pipe coating using a clear coat lacquer to coat pipes between 4" and 8" diameter, with a maximum usage of 50,000 gallons of clear coat per year. Potential criteria air pollutants emissions (PTE) were calculated based on the maximum usage rate of 50,000 gallons, which source has provided. In order to be exempt from Section 3 of 401 KAR 61:132, the source shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

Emission Point	Description	Capacity	Construction	Control Device	Applicable Regulation
EP 9	16" Coating Operation	8 gal/hr	1984	None	401 KAR 50:012 401 KAR 59:010 401 KAR 59:225
	Stoddard Solvent	0.274 gal/hr			

Continuous steel pipe coating using a clear coat lacquer to coat pipes between 4" and 16" diameter, with a potential to emit of 76.1 tons per year. The permit has required the emissions from this point to stay below 76.1 tons per year to preclude the construction of this unit from under going NSR for being a major modification to a major source in a nonattainment area. In order to be exempt from Section 3 of 401 KAR 59:225, the source shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

COOLING TOWERS

Emission Point	Description	Capacity	Construction	Control Device	Applicable Regulation
5	Cooling Tower for 8"	0.072 1000 tons/hr	1976	None	None
	Cooling Tower for 16"	0.09 1000 tons/hr	1984		

HAUL ROADS

Emission Point	Description	Capacity	Construction	Control Device	Applicable Regulation
3	Haul road	0.0913 1000 tons/hr	1976	None	401 KAR 63:010

PART WASHERS

Emission Point	Description	Construction	Control Device	Applicable Regulation
4	12 Part Washers	2005	None	401 KAR 50:012 401 KAR 59:185 401 KAR 63:020

GASOLINE DISPENSER AND TANK

Emission Point	Description	Capacity	Construction	Applicable Regulation
6	Gasoline Tank and Dispenser	1,500 gals of Gasoline (Maximum usage 50,000 gals a year)	2005	40 CFR 63, Subpart CCCCCC

INSIGNIFICANT ACTIVITIES

- Hydraulic oil tank
- Lubricating oil tanks
- Paint sticks for marking coils/paint cans
- Torch cutting of steel
- Kerosene degreasing
- Waste lube oil tank
- 20 KW Computer Equipment Emergency generator (NG)
- 5 KW Maintenance Portable Emergency Generator (Gasoline)
- 40 KW Data Center Emergency generator (Diesel)
- Spaceheaters (NG/propane)
- Kerosene storage tanks
- Water heaters
- Fabrication shop
- Mobile welding/cutting
- Spaceheaters (electric)
- Electric resistance welding (pipe mills)
- Maintenance/welding/grinding/sanding/painting
- Oil storage tanks
- Pipe reamers
- Diesel tank
- Pipe handling
- Maintenance Shop
- Abrasive Blasting
- Abrasive Removal
- Phosphoric-based Acid Wash Solution
- Powder Coating of Pipes

- Pipe Stencil Printing
- Cooling Tower
- 7 Pre-Heat Electric Induction Coils
- 8 Powder Coating Electric Induction Coils

TESTING REQUIREMENTS:
For emission point one and two, the following test methods shall be performed if the division requires it:

- Reference Method 5 tests, or other methods approved by the Division, to determine the emission rate of particulate matter.
- Kentucky Method 150 (F-1) tests to determine the opacity of intermittent emissions or Method 9 tests to determine the opacity of continuous emissions.
- Reference Method 24, or other methods approved by the Division, to verify that the coatings used at an affected facility meet the exemption requirements in 401 KAR 61:132 Section 6 and 401 KAR 59:225 Section 6

EMISSION AND OPERATING CAPS DESCRIPTION: See Emission Points

AIR DISPERSION MODELING:
The Division for Air Quality (Division) has performed air dispersion model screening of potentially hazardous substances that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

PERIODIC MONITORING:

- The permittee shall monitor the amount and type of coating and solvent used at the point of application, including exempt compounds daily. The total coating usage shall be calculated by taking the total clear coat lacquer input to this emission point and subtracting any lacquer recovered from this emission point, up to a maximum of 10 percent of the lacquer input.
- The permittee shall monitor the VOC content as applied in each coating and solvent.
- The permittee shall monitor the amount and type of clean-up, or wash-up solvent (including exempt compounds) used and the VOC content of each daily.

OPERATIONAL FLEXIBILITY: None

Commonwealth of Kentucky
Division for Air Quality
PERMIT APPLICATION SUMMARY FORM

Completed by: Anthony Norman EIT

GENERAL INFORMATION:

Name:	IPSCO Tubulars Inc.
Address:	100 Steel Plant Drive, Wilder, KY 41071
Date application received:	12/9/2013
SIC Code/SIC description:	3317, Steel Pipe and Tubes
Source ID:	21-037-00006
Agency Interest:	613
Activity:	APE20130006
Permit:	V-14-006

APPLICATION TYPE/PERMIT ACTIVITY:

[ ] Initial issuance
[ ] Permit modification
__Administrative
__Minor
__Significant
[X] Permit renewal

[ ] General permit
[ ] Conditional major
[X] Title V
[X] Synthetic minor
[ ] Operating
[X] Construction/operating

COMPLIANCE SUMMARY:

[ ] Source is out of compliance
[X] Compliance certification signed
[ ] Compliance schedule included

APPLICABLE REQUIREMENTS LIST:

[ ] NSR
__ Non-Attainment
__ PSD
__ Netted out of PSD/NSR
__ Not major modification per 401 KAR 51:001, 1(114)(b)

[ ] NSPS
[X] NESHAPS
[ ] CAM

[X] SIP
[ ] Other

MISCELLANEOUS:

[ ] Acid rain source
[ ] Source subject to 112(r)
[X] Source applied for federally enforceable emissions cap
[ ] Source provided terms for alternative operating scenarios
[X] Source subject to a MACT standard
[ ] Source requested case-by-case 112(g) or (j) determination
[X] Application proposes new control technology
[X] Certified by responsible official
[X] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Pollution Prevention Measures
[X] Area is non-attainment (list pollutants): Ozone

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM_{10}	9.394	43.561
VOC	66.9749	289.787
Hazardous Air Pollutants (HAPS)		
Xylene	0.00	0.06
Toluene	0.00	0.059
Isophorone	0.00	0.613
Source wide HAPs or Combined HAPs	0.00	0.732

SOURCE DESCRIPTION:

On December 9, 2013, the Division received IPSCO Tubulars Inc. renewal application for their Title V permit. The source is located at Wilder, Kentucky in Campbell County. The portion of Campbell County that the source is located in is a non-attainment area for Ozone. The source manufactures steel pipes and tubes. The manufacturing process begins by feeding steel coils into the material handling equipment of either the 8" or 16" Pipe Mill where they are cold-formed into a tubular configuration. The resultant tube is in-line welded by a high frequency electric resistance welder and cut into designated lengths. The pipe is inspected, tested, and coated with a varnish if required. Welded tubular products range in size from 4.5 to 16.0 inches in outside diameter.

Part of the renewal is the addition of a new coating facility. The new coating facility will surface treat, acid wash, and powder coat the pipes manufactured at the source's current facility, described above, if their customers request it. The coating process consists of the following activities: Abrasive Blasting, Abrasive Removal, Phosphoric-based Acid Wash Solution, Powder Coating of Pipes, Pipe Stencil Printing, Cooling Tower, 7 Pre-Heat Electric Induction Coils, and 8 Powder Coating Electric Induction Coils. The Abrasive Removal recycles the steel shot and grit form the Abrasive blasting, allowing it to be reused. The Powder Coating of Pipes has a dust collector that is part of the process and allows the powder coating to be recycle and reuse. The new facility will emit Particulate Matter (PM), Volatile Organic Compounds (VOCs), and Hazardous Air Pollutants (HAPs) emissions.

IPSCO Tubulars Inc. has the potential to emit 289.787 tons of VOC per a year. Therefore, the source requires a Title V permit as per 401 KAR 52:020.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

In order to be exempt from Section 3 of 401 KAR 59:225 and 401 KAR 61:132, the source shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

OPERATIONAL FLEXIBILITY: None